



0000030395

## BEFORE THE ARIZONA CORPORATION COMMISSION

RENZ D. JENNINGS  
CHAIRMAN  
MARCIA WEEKS  
COMMISSIONER  
DALE H. MORGAN  
COMMISSIONER

JUL 24 4 37 PM '92

DOCUMENT  
CONTROL

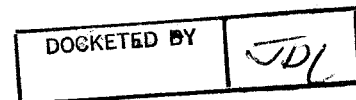
IN THE MATTER OF THE APPLICATION OF  
NETWORK OPERATOR SERVICES, INC. FOR  
AUTHORITY TO OFFER INTRASTATE LONG  
DISTANCE TELECOMMUNICATIONS  
SERVICES IN THE STATE OF ARIZONA.

DOCKET NO. U-2679-92-190

Arizona Corporation Commission

DOCKETED

JUL 24 1992



## APPLICATION TO INTERVENE

## I.

The RESIDENTIAL UTILITY CONSUMER OFFICE (RUCO) hereby applies to  
the Arizona Corporation Commission (Commission) for an Order granting it leave to  
intervene in the above-captioned proceeding.

## II.

RUCO was established by the enactment of Arizona Revised Statutes, Section 40-461,  
*et seq.*, for the purpose of representing residential utility consumers in matters before the  
Commission concerning regulated public service corporations.

## III.

Arizona Revised Statutes, Section 40-464.A.2., specifically provides that the Director  
of RUCO may do the following:

Prepare and present briefs, arguments, proposed rates or orders  
and intervene or appear on behalf of residential utility  
consumers before hearing officers and the Corporation  
Commission as a party in interest and also participate as a party





1 in interest pursuant to Section 40-254 in proceedings relating to  
2 rate making or rate design and involving public service  
3 corporations.

4 IV.

5 The residential utility consumers of Network Operator Services, Inc. will be directly  
6 and substantially affected by a Decision or Order of the Commission in this matter, and it  
7 is therefore necessary and proper that RUCO intervene in the proceeding.

8 V.

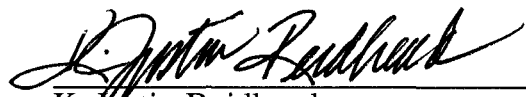
9 In order to fulfill its statutory obligation to the residential utility consumers of this  
10 State, RUCO must thoroughly examine the materials presented by the Company, and must  
11 cross-examine any witnesses appearing on behalf of the Company and any other intervenors.  
12 Additionally, RUCO may present testimony and exhibits of its own in any hearings  
13 conducted by the Commission in this matter.

14 VI.

15 The name, mailing address, and telephone number of the person upon whom service  
16 of all documents is to be made is,  
17

18 K. Justin Reidhead, Chief Counsel  
19 Residential Utility Consumer Office  
20 1501 West Washington, Suite 227  
21 Phoenix, Arizona 85007  
(602) 542-3733

22 RESPECTFULLY SUBMITTED, this 24th day of July, 1992.

23  
24   
25 K. Justin Reidhead  
26 Chief Counsel, RUCO  
27  
28



STATE OF ARIZONA  
RESIDENTIAL UTILITY CONSUMER OFFICE

1501 W. Washington • Suite 227 • Phoenix, AZ 85007 • 542-3733

1 THE ORIGINAL AND TEN COPIES  
2 of the foregoing Application  
3 to Intervene filed this 24th  
4 day of July, 1992 with:  
5  
6 Docket Control Division  
7 Arizona Corporation Commission  
8 1200 West Washington  
9 Phoenix, Arizona 85007  
10  
11 Copies of the foregoing Application  
12 to Intervene hand delivered this  
13 24th day of July, 1992 with:  
14  
15 Beth Ann Burns, Chief Hearing Officer  
16 Hearing Division  
17 Arizona Corporation Commission  
18 1200 West Washington  
19 Phoenix, Arizona 85007  
20  
21 Gary Yaquinto, Director  
22 Utilities Division  
23 Arizona Corporation Commission  
24 1200 West Washington  
25 Phoenix, Arizona 85007  
26  
27 Paul A. Bullis, Chief Counsel  
28 Legal Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007  
A COPY of the foregoing Application  
to Intervene mailed this 24th day  
of July, 1992 to:  
Kent Wilson  
Wilson & Johnson  
1600 Smith Street, Suite 4100  
Houston, Texas 77002  
Attorney for Applicant  
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STATE OF ARIZONA  
RESIDENTIAL UTILITY CONSUMER OFFICE

1501 W. Washington • Suite 227 • Phoenix, AZ 85007 • 542-3733

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Tim Martin, President  
c/o Network Operator Services, Inc.  
119 West Tyler  
Longview, Texas 75601

By Cheryl Fraulob  
Cheryl Fraulob  
Secretary to K. Justin Reidhead